

MAR 12 2020

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

GREGORY CLARK,

Defendant.

No.

4:20CR00177 RLW/PLC

INDICTMENT

The Grand Jury charges that:

COUNT ONE

[Interstate Extortion: 18 U.S.C. § 875(d)]

On or about February 25, 2020, in the Eastern District of Missouri and elsewhere, the
defendant,

GREGORY CLARK,

knowingly transmitted in interstate and foreign commerce, from the State of North Carolina, with
intent to extort from "DW," a corporation located in St. Louis, Missouri, money and other things
of value, an electronic mail communication containing a threat to injure the property and reputation
of DW.

All in violation of Title 18, United States Code, Section 875(d).

The Grand Jury further charges that:

COUNT TWO

[Interstate Activity in Aid of Racketeering: 18 U.S.C. § 1952(a)(3)(A)]

From in or about February 25, 2020, through in or about March 5, 2020, in the Eastern
District of Missouri and elsewhere, the defendant,

GREGORY CLARK,

used a facility in interstate commerce, to wit: electronic mail communication, with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is, interstate extortion, in violation of 18 U.S.C. § 875(d), and thereafter performed and attempted to perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity, in that the defendant sent an extortionate electronic mail message containing a threat to injure the property and reputation of corporation "DW," headquartered in St. Louis, Missouri, and subsequently engaged in telephone communications, electronic mail communications, and use of the mails in furtherance of the unlawful activity.

All in violation of Title 18, United States Code, §1952(a)(3)(A).

The Grand Jury further charges that:

COUNT THREE

[Interference with Commerce by Means of Extortion: 18 U.S.C. § 1951(a)]

From on or about February 25, 2020, through in or about March 5, 2020, in the Eastern District of Missouri and elsewhere, the defendant,

GREGORY CLARK,

did attempt to obstruct and affect commerce and the movement of articles and commodities in commerce by extortion, as those terms are defined in Title 18, United States Code, section 1951, that is, the defendant attempted to obtain the property of "DW," a corporation engaged in interstate commerce and headquartered in St. Louis, Missouri, with DW's consent induced by the wrongful use of fear of economic loss, in that the defendant threatened to disseminate DW's proprietary

business information, thus causing an economic loss to DW, unless DW gave the defendant a check for \$200,000.

All in violation of Title 18, United States Code, Section 1951(a).

Dated: _____

A TRUE BILL

FOREPERSON

JEFFREY B. JENSEN
United States Attorney

GWENDOLYN E. CARROLL #4657003NY
Assistant United States Attorney